

**RDA 2304**

**Set 4**

**FACILITY ID**

**840025**

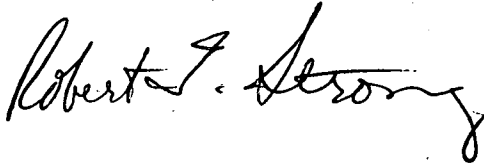
MEMO TO FILE # 8-840025

DATE: SEPTEMBER 11, 1995

FACILITY NAME: DELFIELD COMPANY

The Delfield Company was on my register of facilities to be inspected on the third compliance inspection list. During the initial phone interview, I discovered that the tank(s) at Delfield Company never held petroleum products and were actually flow-through process tanks used by the previous owners, Litton Industries. The Jackson Field Office received a letter from Delfield on 8/31/95 stating that these tanks never should have been registered. I faxed a copy of this letter to Amanda Perry in the Nashville Central Office. Any further action on this matter will be decided by the N.C.O.

Robert T. Strong  
Jackson Field Office

A handwritten signature in cursive script, reading "Robert T. Strong". The signature is written in dark ink and is positioned below the typed name and title.

CEIVED

AUG 31 1995

The Delfield Company

Ans'd.....

Charles R. McCollom  
Vice President, Manufacturing

August 28, 1995

Mr. Robert Strong  
State of Tennessee  
Underground Storage Division  
362 Carriage House Drive  
Jackson, TN 38305

Dear Mr. Strong:

This letter will respond to your inquiry about underground storage tanks at our facility at One Delfield Drive, Covington, Tennessee.

There are currently no underground storage tanks of any nature in use at our Covington facility. To the best of our knowledge, the only historical existence of tank type storage was in the form of indoor floor sumps used by Litton Industries, the former owners of this plant. The sumps were cleaned, filled, and covered in February 1985 (detail enclosed).

If you have any further questions, please contact Mr. K. (Buddy) Warren, Maintenance Supervisor, at our Covington facility, 901/476-1225.

Very truly yours,



Charles R. McCollom  
Vice President, Manufacturing

CRM:lfv

Enclosure

cc: Jay Rivers  
Buddy Warren

P.O. Box 470 (48804-0470)  
980 South Isabella Road, Mount Pleasant, Michigan 48858  
(517) 773-7981



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*R. Kirkman*

AUG 31 1995

REAL ESTATE DEPARTMENT - PLANNING, DESIGN AND CONSTRUCTION - TRIP REPORT

Ans'd.....

<u>Project</u>	I.I.P.I. (New Britain Tool) Process Waste Cleanup Covington, TN	<u>Date</u>	February 8, 1985
		<u>P.O. Number</u>	Z-8444-T
<u>Trip Dates</u>	February 6-7, 1985	<u>Project Authorization</u>	\$ 30,000.00
<u>By</u>	Keith A. Knapp Supervisor, Project Management	<u>Project Commitments</u>	\$ 25,660.00
		<u>Planned Completion</u>	February, 1985

Purpose

To verify the scope and expedite the completion of on-site cleanup activities.

Persons Contacted

Gordon Tengen	Director of Manufacturing	Delfield Corporation
Buddy Warren	Building Maintenance	Delfield Corporation
Larry Trapp	Supervisor, Field Operations	Chemical Waste Management, Inc.

Contract Documents

The Waste Transportation and Disposal Agreement for this project was signed by Litton on January 30 and by Chemical Waste Management on January 31, 1985. This contract covers the on-site cleanup operations, the loading and transportation of the waste materials to an approved facility as well as the treatment, storage and/or disposal of the waste materials in accordance with current EPA and state regulations.

Cleanup Operations

At the time of the writer's site visit, cleanup activities were progressing well by Chemical Waste Management. The liquids contained in the two floor sumps had been pumped into a tanker truck and transported to the waste storage and disposal facility in Emelle, AL. Roughly half of the concrete floor trenches had been cleaned of debris and existing PVC and metal piping. Debris and sludge from the bottom and sides of the trenches was being shoveled into EPA-approved 55 gallon steel drums; piping was piled onto polyethylene sheets and bundled for transportation to Emelle. Due to the deteriorated condition of many of the steel trench covers, Chemical Waste was instructed to also remove these from the site.

Following the cleanup of the floor trenches, overhead PVC ductwork was to be taken down, disassembled or sawed into smaller pieces and transported to Emelle.

The final cleanup operation on the site will be steamcleaning of the two floor sumps and the approximately 800 lineal feet of concrete floor trenches. Water used in this washing operation will be pumped into another tanker truck for disposal at Emelle.

Schedule

Mr. Trapp of Chemical Waste had hoped to complete these on-site cleanup activities by

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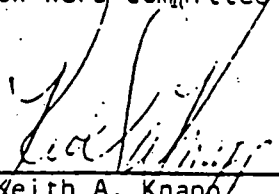
FEB 11 1985

R. F. KIRKMAN

L.I.P.I., (New Britain Tool)  
Trip Report  
February 8, 1985

Page 2

Friday, February 8, 1985, although he and his crew were committed to working on Saturday, if necessary.

  
\_\_\_\_\_  
Keith A. Knapp  
Supervisor, Project Management  
Chicago

KAK:mr  
Distribution:  
R. Jensen  
R. Kirkman  
J. Vukovitz